Golder Associates

September 18, 2009

Project No.: 933-6154-004
Via e-mail and US Postal Service

Ms. Mary P. Logan
USEPA Region V (SR-6J)
77 West Jackson Boulevard
Chicago, IL 60604

RE: SURFACE SOIL MIREX RESULTS
OPERABLE UNIT 2
NEASE CHEMICAL SITE, SALEM, OHIO

Dear Mary:

Golder Associates Inc. (Golder) has prepared this letter on behalf of RÜTGERS Organics Corporation (ROC) to present the results of surface soil sampling for mirex completed in June 2009, and to propose additional delineation sampling.

In June 2009, Golder sampled four areas of the Site (A28, A29, and A30 and A31) shown on Figure 1 (attached). Areas A28 and A29 are located on the western and eastern boundaries of the Site, respectively. Areas A30 and A31 are located between the Former Pond 3 and Feeder Creek. Samples were collected in these areas to further delineate portions of areas A01, A08 and A09 (see Figure 1) that exceed the site-specific preliminary remediation goal (PRG) for mirex of 1,000 micrograms per kilogram (µg/kg).

In each area, discrete samples were collected at the locations shown on Figure 1 and a portion of each discrete sample was homogenized into one composite sample for analysis. The composite samples were analyzed for mirex following USEPA Method 8081A, and the results from all areas exceeded the PRG for mirex (A28 = 230,000 µg/kg, and A29 = 1,500 µg/kg). Following receipt of these results, the remaining discrete samples from Area A28 (denoted as A28-01 through A28-05) and Area 29 (A29-01 through A29-07) were analyzed. The results from the analyses of these discrete samples are the following:

Area A28		Area A29	
Discrete Sample ID	Result (µg/kg)	Discrete Sample ID	Result (µg/kg)
A28-01	620	A29-01	560
A28-02	560	A29-02	**1,100**
A28-03	500	A29-03	**1,200**
A28-04	**1,400,000**	A29-04	**6,700**
A28-05	**35,000**	A29-05	**2,700**
		A29-06	**3,100**
		A29-07	**1,100**

Samples shown shaded and in bold in the table above exceed the site-specific PRG for mirex.

Based on these results, and subject to securing access, it is proposed to collect four additional samples to delineate the discrete exceedances in Area A28 and five samples to delineate the discrete exceedances at Area A29 as shown on Figure 1.

Golder Associates Inc.
200 Century Parkway, Suite C
Mt. Laurel, NJ 08054 USA
Tel: (856) 793-2005 Fax: (856) 793-2006 www.golder.com

Discrete soil samples will be collected following the approved procedures from the *Final Pre-Design Investigation Work Plan, Operable Unit Two (OU-2) Rütgers Organics Corporation Nease Chemical Site, Salem, Ohio* (Golder, 2006). All samples will be submitted to TestAmerica of North Canton, Ohio for analysis of mirex.

The analytical results for composite samples from Areas A30 and A31 were 48,000 µg/kg and 66,000 µg/kg, respectively. As discussed with USEPA and Ohio EPA, the entire area between Former Pond 3 and Feeder Creek will be addressed by the OU-2 remedy and Feeder Creek will be addressed as part of OU-3. Therefore, no additional soil sampling is proposed in this area.

Your approval to proceed with this additional soil sampling is requested. If you should have any questions, please do not hesitate to contact Dr. Rainer Domalski at ROC (814/238-5200) or the undersigned (856/793-2005).

Very truly yours,

GOLDER ASSOCIATES INC.

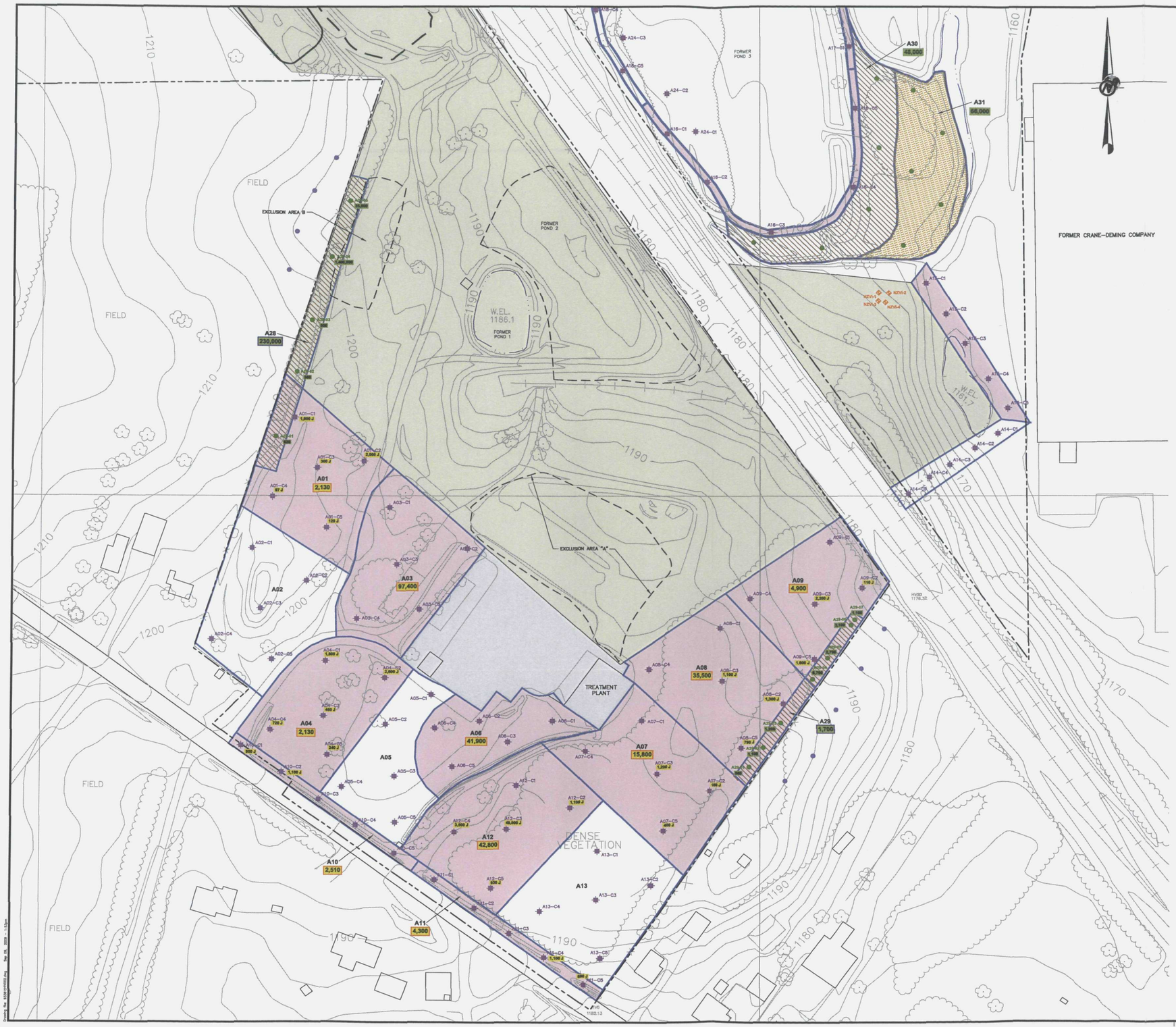
Charles J. Lawrence, Jr.
Senior Project Geologist

FOR P. Stephen Finn, C. Eng.
Principal

CJL/PSF/bjb

Enclosure

cc: Sheila Abraham, Ohio EPA
Tim Christman, Ohio EPA
Rainer Domalski, ROC



LEGEND

- APPROXIMATE PROPERTY LINE
- STREAM
- COMPOSITE SAMPLING AREA BOUNDARY
- PRELIMINARY LAYOUT OF PROPOSED LOW PERMEABILITY CAP
- APPROXIMATE EXTENT OF PAVED SURFACE
- COMPOSITE AREAS EXCEEDING MIREX SITE-SPECIFIC PRG OF 1,000 ug/kg
- ADDITIONAL DELINEATION SAMPLING AREAS
- CONTINGENCY DELINEATION SAMPLING AREA
- A13-C1 — 2006 DISCRETE SAMPLING LOCATION
- 7,770 — 2006 SELECT DISCRETE SAMPLING RESULT (ug/L)
- 4,900 — 2006 COMPOSITE SAMPLING RESULT (ug/L)
- A29-01 — 2009 DISCRETE SOIL SAMPLING LOCATION
- 1,100 — 2009 SELECT DISCRETE SAMPLING RESULT (ug/L)
- 1,700 — 2009 COMPOSITE SAMPLING RESULT (ug/L)
- PROPOSED SAMPLING LOCATION

NOTES

1.) J = ESTIMATED RESULT

2.) SELECT DISCRETE SAMPLES ANALYZED FOR ADDITIONAL DELINEATION.

REFERENCES

1.) TOPOGRAPHIC BASE MAP TAKEN FROM AUTOCAD FILE CREATED BY HOWELLS AND BAIRD, INC., DATED 06/14/95, DATE OF AERIAL PHOTOGRAPHY 04/06/95.

2.) PROPERTY LINE TAKEN FROM DIGITAL CAD FILE TITLED "TOPOGRAPHIC SURVEY FOR RUTGERS ORGANICS/NEASE CHEMICAL." COMPILED FROM AERIAL PHOTOGRAPHY, DATED 04/06/06, PROVIDED BY HOWELLS & BAIRD, INC.

3.) NZW LOCATIONS TAKEN FROM DIGITAL CAD FILE 08-3337 NEASE.DWG, TITLED "TOPOGRAPHIC SURVEY FOR RUTGERS ORGANICS/NEASE CHEMICAL." COMPILED FROM AERIAL PHOTOGRAPHY, DATED 04/06/06, PROVIDED BY HOWELLS & BAIRD, INC.

DRAFT

SCALE 50 0 50 100 FEET

REV	DATE	DES	REVISION DESCRIPTION	CADD	CHK	RVW

PROJECT
RUTGERS Organics Rutgers Organics Corporation
RUTGERS ORGANICS CORPORATION
BASELINE CONDITIONS
TECHNICAL MEMORANDUM ADDENDUM
SALEM, OHIO

TITLE
MIREX RESULTS FOR SURFACE SOIL

Golder Associates Philadelphia USA

PROJECT No.	933-6154	FILE No.	9336154V002		
DESIGN	CJL	09/09/09	SCALE	AS SHOWN	REV. 0
CADD	MJS	09/09/09			
CHECK			**FIGURE 1**		
REVIEW					